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*Attorneys for the County of Camden, Camden County Police Department, John Scott Thomson,
and Nicholas Marchiafava*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

XAVIER INGRAM,

Plaintiff,

vs.

**COUNTY OF CAMDEN, CAMDEN
COUNTY POLICE DEPARTMENT,
JEREMY MERCK, ANTONIO
GENNETTA, NICHOLAS
MARCHIAFAVA, JOHN SCOTT
THOMSON, ORLANDO CUEVAS, JOHN
DOE(S) 1-50, and
ABC ENTITIES 1-10.**

Defendants.

CIVIL ACTION NO. 1:14-CV-05519

**NOTICE OF DEFENDANTS CAMDEN COUNTY, CAMDEN COUNTY POLICE
DEPARTMENT, JOHN SCOTT THOMSON, AND NICHOLAS MARCHIAFAVA'S
MOTION TO DISMISS ALL CLAIMS RELATING TO POST-HANDCUFFING
MOVEMENTS OF INGRAM BY DEFENDANT MARCHIAFAVA
PURSUANT TO FED. R. CIV. P. 50**

TO: Clerk, United States District Court
District of New Jersey
Mitchell H. Cohen Federal Courthouse
1 John F. Gerry Plaza
Camden, New Jersey 08101
(VIA ELECTRONIC FILING)

ALL RECORD COUNSEL
(VIA ELECTRONIC FILING)

PLEASE TAKE NOTICE that the undersigned, on behalf of Defendants County of Camden, Camden County Police Department, Chief John Scott Thomson, and Nicholas Marchiafava, hereby move before the Honorable Juan R. Sánchez, C.J., for an Order dismissing all claims relating to post-handcuffing movements of Plaintiff Xavier Ingram by Defendant Marchiafava pursuant to Fed. R. Civ. P. 50.

PLEASE TAKE FURTHER NOTICE that the undersigned shall rely on the attached Brief in support of Motion. A proposed form of Order is also attached.

PLEASE TAKE FURTHER NOTICE that Defendants do not request oral argument unless timely opposition is filed.

Respectfully submitted,

BROWN & CONNERY, LLP

By: *s/ William F. Cook*
William F. Cook

DATED: March 9, 2022